

1 THE LAW OFFICES OF ALLEN HYMAN
Allen Hyman (California SBN 73371)
2 10737 ½ Riverside Drive
N. Hollywood, CA 91602
3 lawoffah@aol.com
P: (818) 763-6289

4
5 THE ROTH LAW FIRM, PLLC
Richard A. Roth * *Pro Hac Vice*
6 Email: Richard@rrothlaw.com
Brian S. Levenson * *Pro Hac Vice*
7 Email: Brian@rrothlaw.com
8 295 Madison Avenue, 22nd Floor
New York, NY 10017
9 Phone: 212-784-6699

10
11 *Attorneys for Plaintiff*

12
13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 FIONA HARVEY,

16
17 Plaintiff,

18 v.

19 NETFLIX, INC. and NETFLIX
WORLDWIDE ENTERTAINMENT, LLC,

20
21 Defendants.

Case No. 2:24-cv-04744-RGK-AJR

**[PROPOSED] ORDER
GRANTING PLAINTIFF'S
REQUEST FOR JUDICIAL
NOTICE IN OPPOSITION TO
DEFENDANTS' MOTION
TO DISMISS**

[PROPOSED] ORDER

Based on Plaintiff Fiona Harvey’s Request for Judicial Notice in Opposition to defendants Netflix, Inc., and Netflix Worldwide Entertainment LLC (collectively, “Netflix”) Motion to Dismiss the Plaintiff’s Complaint, and for good cause appearing for the entry thereof, IT IS HEREBY ORDERED that the Court will take judicial notice of:

1. **Exhibit 1:** Transcript of the May 8, 2024 hearing (the “Hearing”) of the Culture, Media and Sport Committee (the “Committee”) in the House of Commons, available on UK Parliament’s website at (transcript available at <https://committees.parliament.uk/committee/378/digital-culture-media-and-sport-committee/publications/oral-evidence/>) (last visited August 6, 2024).
2. **Exhibit 2:** Promotional material for Baby Reindeer on Netflix’s website available at <https://www.netflix.com/tudum/articles/baby-reindeer-cast-release-date-plot> (last visited August 6, 2024)
3. **Exhibit 3:** Netflix letter dated May 23, 2024 to the Committee clarifying its statement at the Hearing that “the person on whom the show is based” was the subject of a court order and not a criminal conviction, available at <https://api.parliament.uk/committees/publications/45022>
4. **Exhibit 4:** UK Parliament webpage explaining the process of becoming a Member of Parliament available at <https://www.parliament.uk/about/mps-and-lords/members/electing-mps/> (last visited August 6, 2024).

5. **Exhibit 7:** Screenshot of a video that Netflix posted to its social media accounts on Twitter, Facebook and Instagram proclaiming, “Martha’s emails from *Baby Reindeer*. Everyone of them is real.” Netflix’s post received 460,000 views on Twitter, 2.9 million plays on Facebook, available at <https://www.facebook.com/netflixus/videos/marthas-emails-from-baby-reindeer-every-one-of-them-real/1071706193898341/> and <https://x.com/netflix/status/1779162630520729877?lang=en>.

6. **Exhibit 8:** Tweet from FionaHarvey2014 to MrRichardGadd dated September 23, 2014 that states: “@MrRichardGadd my curtains need hung badly.”

7. **Exhibit 9:** Excerpts from Netflix’s 2024 10-K filed with the Securities and Exchange Commission at <https://www.sec.gov/ix?doc=/Archives/edgar/data/1065280/000106528024000030/nflx-20231231.htm> (last visited August 21, 2024).

The Court takes notice of the aforementioned exhibits on the grounds that their existence and contents are public records not subject to reasonable dispute. Fed. R. Evid. § 201(b)(1)-(2); *Khoja v. Orexigen Therapeutics, Inc.*, 899 F.3d 988, 1001 (9th Cir. 2018); *GeoVector Corp. v Samsung Elecs. Co. Ltd.*, 234 F Supp 3d 1009, 1016 (N.D. Cal. 2017); *Lindora, LLC v. Limitless Longevity LLC*, 2016 WL 6804443, at *3 (S.D. Cal. Sept. 29, 2016)

IT IS SO ORDERED

Dated: _____, 2024

Hon. R. Gary Klausner
United States District Judge